

W. CHRISTIAN KRANKEMANN (SBN 220438)  
JIM M. BOARDMAN (SBN 304653)  
KRANKEMANN LAW OFFICES P.C.  
Attorneys At Law  
420 E Street, Suite 100  
Santa Rosa, California 95404  
Telephone: (707) 524-2200  
Facsimile: (866) 858-0100  
[jmb@krankmemann.com](mailto:jmb@krankmemann.com)

Attorney for Plaintiff  
GEORGE CLINE

SHARON C. COLLIER (SBN 203450)  
TRAVIS D. SWALLOW (SBN 339984)  
FREEMAN MATHIS & GARY, LLP  
1010 B Street, Suite 400  
San Rafael, CA 94901  
Telephone: (415) 394-9500  
Facsimile: (833) 317-0293  
[sxcollier@fmglaw.com](mailto:sxcollier@fmglaw.com)  
[travis.swallow@fmglaw.com](mailto:travis.swallow@fmglaw.com)

Attorneys for Defendant  
CALPINE OPERATING SERVICES COMPANY, INC and  
GEYSERS POWER COMPANY, LLC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

GEORGE CLINE, a California resident,  
  
Plaintiff,  
  
vs.

CALPINE CORPORATION, a Delaware  
corporation, CALPINE OPERATING  
SERVICES COMPANY, INC. a Delaware  
corporation and GEYSERS POWER  
COMPANY, LLC, a Delaware corporation.  
  
Defendants.

CASE NO.: 3:22-CV-07031-RS

~~PROPOSED~~ ORDER AND JOINT  
STIPULATION TO CONTINUE CASE  
MANAGEMENT CONFERENCE

Case Mgmt. Conf.: July 27, 2023  
Complaint File: November 10, 2022

The parties to this action, Plaintiff GEORGE CLINE ("Plaintiff") and Defendants  
CALPINE OPERATING SERVICES COMPANY, INC. ("Calpine Operating") and GEYSERS  
POWER COMPANY, LLC ("Geysers Power") by and through their respective attorneys of records

1 hereby stipulate to the following:

2 WHEREAS, Plaintiff GEORGE CLINE filed his Complaint in this matter on November 10,  
3 2022.

4 WHEREAS, Plaintiff originally named a single Defendant Calpine Corporation in the  
5 Complaint.

6 WHEREAS, Plaintiff's counsel and counsel for Calpine Corporation met and conferred and  
7 determined that two subsidiary companies of Calpine Corporation were the proper Defendants in  
8 the case.

9 WHEREAS, all Parties entered into a stipulation in which Plaintiff would file an Amended  
10 Complaint naming CALPINE OPERATIONS SERVICES COMPANY, INC. and GEYSERS  
11 POWER COMPANY, LLC. as Defendants in the action and dismiss without prejudice defendant  
12 Calpine Corporation.

13 WHEREAS, Plaintiff served an Amended Summons and First Amended Complaint naming  
14 Calpine Operating and Geysers Power on May 22, 2023.

15 WHEREAS, Plaintiff filed a Second Amended Complaint on June 19, 2023 that corrected  
16 the allegations against the corporate entities, dropped claims against Calpine Corporation. and  
17 asserted claims against Calpine Operating and Geysers Powers.

18 WHEREAS, Defendants have until July 19, 2023 to file a responsive pleading to the Second  
19 Amended Complaint pursuant to the Joint Stipulation and Order filed and granted on June 1, 2023.

20 WHEREAS, the Parties filed a Joint Stipulation for Dismissal Calpine Corporation without  
21 Prejudice on July 11, 2023.

22 WHEREAS, the parties desire to have the responsive pleading filed and the case at issue  
23 prior to submitting a Joint Case Management Statement and appearing for the initial Case  
24 Management Conference with the Court.

25 **IT IS HEREBY STIPULATED BETWEEN THE PARTIES:**

- 26 1. The Case Management Conference currently set for July 27, 2023 shall be continued to  
27 August 31, 2023.  
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- 1           2. The last day to file the Rule 26(f) Report, complete initial disclosures or statement  
2           objections in Rule 26(f) Report and to file Case Management Statement per Standing  
3           Order re Contents of Joint Case Management Statement shall be August 24, 2023.  
4           3. All other deadlines will track the filing date of the Second Amended Complaint.

5 **IT IS SO STIPULATED.**

6           The parties attest that concurrence in the filing of these documents has been obtained from  
7 each of the other Signatories, which shall serve in lieu of their signatures on the documents.


8  
9 DATED: July 18, 2023

KRANKEMANN LAW OFFICES P.C.

10  
11 By                     /s/                      
12 JIM M. BOARDMAN  
13 Attorney for Plaintiff

14 DATED: July 18, 2023

FREEMAN MATHIS & GARY, LLP

15  
16 By                                           
17 TRAVIS D. SWALLOW  
18 Attorney for Defendants

19 **IT IS SO ORDERED.**

20 Date: July 18, 2023

21                                           
22 JUDGE U.S.D.C. NORTHERN DISTRICT OF  
23 CALIFORNIA  
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